

EXHIBIT 3
REDACTED VERSION OF
DOCUMENT SOUGHT TO
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.;) 17-cv-00939-WHA
OTTOMOTTO, LLC; OTTO TRUCKING LLC,)
Defendants.)
)

HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

VIDEOTAPED DEPOSITION OF JENNIFER HAROON

San Francisco, California

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Volume I

Reported by:

MARY J. GOFF

CSR No. 13427

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1	Q	Okay. [REDACTED]	[REDACTED]
		[REDACTED]	05:10:53
3	Q	Okay. [REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	05:11:35
13	Q	Do you know [REDACTED]	[REDACTED]
		[REDACTED]?	05:11:38
15		MS. BAILY: Object to form.	05:11:41
16	A	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]
		[REDACTED]	05:11:50
19	Q	Okay. Who else was involved in that	05:11:56
20		evaluation effort?	05:11:58
21	A	That one, again, I was not there from the	05:12:01
22		start. Chris Urmson; Ming Su, as our financial	05:12:04
23		analyst; Dmitri Dolgov; Dave Ferguson; Anne Widera.	05:12:18
24		Those are the people I remember.	05:12:36
25	Q	Okay. Do you recall anybody from Google X	05:12:42

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1 involved in that process? 05:12:45
2 A I do not, no. 05:12:49
3 Q And you said that [REDACTED] [REDACTED]
[REDACTED]; is that correct? 05:12:54
5 A That's correct. 05:12:58
6 Q Okay. Do you remember [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 05:13:06
9 Q Okay. [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 05:13:28
14 Q Okay. And when did that process start? 05:13:30
15 A [REDACTED], but I don't 05:13:38
16 remember the exact date. 05:13:41
17 Q And who else was involved? 05:13:45
18 A Chris Urmson, Dmitri Dolgov, Dave 05:13:51
19 Ferguson, Anne Widera, Cynthia Kwon from my team for 05:13:55
20 a specific -- for a short time. John Krafcik, once 05:14:02
21 he had joined from the -- so that's from the 05:14:07
22 self-driving car side. 05:14:11
23 Q And then from the Google side? 05:14:13
24 A [REDACTED] I believe his last 05:14:17
25 name is [REDACTED], but I'm not 100 percent sure. There 05:14:28

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1 were some analysts from the Corp. dev team. I can't 05:14:32
2 remember their names right now. One other 05:14:37
3 principal, but I can't remember his name either. 05:14:45
4 Q Do you remember the role? 05:14:48
5 A I believe he was at the principal level. 05:14:50
6 Q What was [REDACTED] role in that 05:14:56
7 evaluation process? 05:15:00
8 A I would say he led the day-to-day. 05:15:05
9 Q He led the day-to-day on the Google X 05:15:11
10 side -- or on the Google side -- 05:15:13
11 A Yes -- 05:15:14
12 Q -- or overall? 05:15:14
13 A For the Google side, yes. 05:15:16
14 Q Okay. And do you know what [REDACTED] 05:15:19
15 job title is. 05:15:20
16 A I believe it's director, but I'm not 05:15:22
17 100 percent sure. 05:15:24
18 Q And who led the day-to-day on the 05:15:29
19 self-driving side? 05:15:32
20 A I would say Chris. 05:15:37
21 Q Anybody else? 05:15:43
22 A As the leader? 05:15:45
23 Q Um-hum. 05:15:48
24 A No. I -- I would say Chris -- 05:15:48
25 Q Okay. 05:15:51

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1	A -- was the lead.	05:15:51
2	Q Who was -- who was sort of in the overall	05:15:57
3	lead on the -- well, let me rephrase that.	05:15:59
4	On the self-driving side, was there	05:16:10
5	somebody above Chris who was not involved in the	05:16:13
6	day-to-day necessarily but has some of the final	05:16:19
7	authority?	05:16:25
8	MS. BAILY: Object to form.	05:16:25
9	A Not until John Krafcik joined the team.	05:16:27
10	Q Okay. And then at that point it was	05:16:31
11	Mr. Krafcik?	05:16:34
12	A I honestly don't know between them.	05:16:36
13	Q Okay. [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] ?	05:16:56
16	MS. BAILY: Object to form.	05:16:57
17	A [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	05:17:49

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1 Q And do you recall [REDACTED] [REDACTED]
[REDACTED]
[REDACTED] ? 05:17:56

4 A I don't. I mean -- yeah. 05:17:59

5 Q Is it fair to say it would have been 05:18:06

6 whatever [REDACTED] ? 05:18:07

7 A That's -- 05:18:10

8 MS. BAILY: Object to form. 05:18:10

9 A -- fair to say. Sorry. That's likely. 05:18:11

10 Q Okay. Is there a possibility that there 05:18:14

11 would have been [REDACTED] [REDACTED]
[REDACTED] ? 05:18:22

13 MS. BAILY: Object to form. 05:18:26

14 A [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] 05:18:53

21 Q Do you recall [REDACTED] [REDACTED]
[REDACTED] ? 05:18:59

23 MS. BAILY: Object to form. 05:19:00

24 A I don't -- I mean, what would you 05:19:04

25 describe -- what would you call significant? 05:19:13

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1	Q	Anything that you would consider	05:19:16
2		significant for purposes of this question.	05:19:18
3		MS. BAILY: Object to form.	05:19:22
4	A	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	05:19:57
9	Q	Okay. [REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]?	05:20:01
11	A	Yes.	05:20:04
12	Q	Okay. And do you recall [REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]?	05:20:08
14	A	I do recall that we found a mistake -- a	05:20:13
15		small mistake, so we fixed that. But it --	05:20:16
16	Q	Okay.	05:20:18
17	A	-- was -- it was -- didn't have a big	05:20:18
18		impact.	05:20:21
19	Q	Anything else?	05:20:21
20	A	Like I said, we -- there were other --	05:20:26
21		there were other changes during that time that I do	05:20:27
22		believe we made, but I don't remember the substance	05:20:30
23		of all of them.	05:20:32
24	Q	Okay. Do you remember the substance of	05:20:33
25		any of them?	05:20:35

1 A No. 05:20:35
2 Q Okay. [REDACTED] [REDACTED]
[REDACTED] [REDACTED] ? 05:20:43
4 A That's correct. 05:20:48
5 Q Who in the self-driving team was the -- 05:20:48
6 within the self-driving team, was there a principal 05:20:50
7 point of contact with [REDACTED]? 05:20:53
8 A I would say Chris. 05:21:01
9 Q Anybody else? 05:21:04
10 A Myself. 05:21:05
11 Q And then who were your contacts -- 05:21:11
12 contacts at [REDACTED]? 05:21:13
13 A So the primary -- the lead was a gentleman 05:21:21
14 named [REDACTED] And I can't remember his last name. And 05:21:23
15 I don't remember the name of his team members. 05:21:28
16 Q Do you remember anybody else from [REDACTED]
[REDACTED]? 05:21:31
18 A No. There were at least two other people. 05:21:32
19 Q Okay. And can you describe what -- what 05:21:37
20 [REDACTED] did as part of this process? 05:21:47
21 A So you know, [REDACTED]
[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED] 05:22:12

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1 [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] 05:22:54

9 Q Okay. Do you recall [REDACTED] [REDACTED]

[REDACTED] ? 05:23:07

11 A I don't recall [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] 05:23:28

15 Q Do you recall any others? 05:23:39

16 A Not off the top of my head. 05:23:43

17 Q How was [REDACTED] ? 05:23:44

18 MS. BAILY: Object to form. 05:23:45

19 A [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] 05:24:04

24 Q And by [REDACTED] [REDACTED]

[REDACTED] is that correct? 05:24:15

1	A	That's correct.	05:24:18
2	Q	Okay. [REDACTED]	[REDACTED]
[REDACTED]		--	05:24:21
4		MS. BAILY: Object to form.	05:24:23
5	Q	-- [REDACTED]?	05:24:24
6	A	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	05:24:48
11	Q	You also [REDACTED]	[REDACTED]
[REDACTED]		[REDACTED], correct?	05:24:55
13	A	That's correct.	05:24:56
14	Q	Okay. [REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]?	05:25:08
17	A	So as I mentioned previously, [REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	05:25:39

1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 05:26:14
9 Q And so as a result of all this work, [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] ? 05:26:31
13 MS. BAILY: Object to form. 05:26:33
14 A I don't [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] 05:26:56
18 Q Do you recall [REDACTED] [REDACTED]
[REDACTED] 05:27:00
20 MS. BAILY: Object to form. 05:27:02
21 A I don't remember [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] . 05:27:12
24 THE COURT REPORTER: Did you say [REDACTED] [REDACTED]
[REDACTED] ? 05:27:25

1 I, MARY J. GOFF, CSR No. 13427, Certified
2 Shorthand Reporter of the State of California,
3 certify;

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth, at
6 which time the witness declared under penalty of
7 perjury; that the testimony of the witness and all
8 objections made at the time of the examination were
9 recorded stenographically by me and were thereafter
10 transcribed under my direction and supervision; that
the foregoing is a full, true, and correct
11 transcript of my shorthand notes so taken and of the
12 testimony so given;

13 That before completion of the deposition,
14 review of the transcript () was (XX) was not
15 requested: () that the witness has failed or
refused to approve the transcript.

16 I further certify that I am not financially
17 interested in the action, and I am not a relative or
18 employee of any attorney of the parties, nor of any
19 of the parties.

20 I declare under penalty of perjury under the
21 laws of California that the foregoing is true and
22 correct, dated this 27th day of July, 2017.

23
24 
25 MARY J. GOFF, CSR No. 13427